

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FEDERAL TRADE COMMISSION,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO.
)	1:04-CV-3294-CAP
)	
NATIONAL UROLOGICAL GROUP,)	
INC., et als.,)	
)	
Defendants.)	

**NOTICE OF DEFENDANTS HI-TECH PHARMACEUTICALS, INC.,
JARED WHEAT, AND STEPHEN SMITH’S MOTION FOR A STAY OF
ALL GARNISHMENT ACTIVITY AND FOR AN ACCOUNTING**

Pursuant to Federal Rules of Civil Procedure 60(b)(5) and (6), Defendants Hi-Tech Pharmaceuticals, Inc. (“Hi-Tech”), Jared Wheat, and Stephen Smith, by and through their undersigned counsel, respectfully submit this Motion for a Stay of All Garnishment Activity and for an Accounting. The grounds for this motion are set forth in the accompanying Memorandum of Law. A proposed Order is also being submitted herewith.

Respectfully submitted this 30th day of December, 2020.

/s/ Arthur W. Leach

Law Office of Arthur W. Leach
5780 Windward Parkway, Suite 225
Alpharetta, Georgia 30005
(404) 786-6443

art@arthurleach.com
Georgia Bar No. 442025
Counsel for Hi-Tech and Jared Wheat

/s/ Jack Wenik

EPSTEIN BECKER & GREEN, P.C.
One Gateway Center
Newark, New Jersey 07102
(973) 639-5221
jwenik@ebglaw.com
Admitted *pro hac vice*
Counsel for Hi-Tech and Jared Wheat

/s/ E. Vaughn Dunnigan

Law Office of E. Vaughn Dunnigan
2897 N. Druid Hills Rd., Suite 142
Atlanta, Georgia 30329
evdunnigan@hotmail.com
Georgia Bar No. 234350
Counsel for Stephen Smith

CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2020, I have filed electronically a true copy of Defendants' Notice of Motion for a Stay of All Garnishment Activity and for an Accounting, Proposed Order, and Memorandum of Law with the United States District Court for the Northern District of Georgia and served all counsel of record with same via the CM/ECF system.

/s/ Jack Wenik

EPSTEIN BECKER & GREEN, P.C.

One Gateway Center

Newark, New Jersey 07102

(973) 639-5221

jwenik@ebglaw.com

Admitted *pro hac vice*

Counsel for Hi-Tech and Jared Wheat